

REMARKS

Claims 1-15 are pending in this application. By this Amendment, claims 1, 4 and 9 are amended. No new matter is added by these amendments. Reconsideration of the application in view of the above amendments and the following remarks is respectfully requested.

Entry of the amendments is proper under 37 C.F.R. §1.116 since the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issue requiring further search and/or consideration since the amendments amplify issues previously discussed throughout prosecution; (c) satisfy a requirement of form asserted in the previous Office Action; and (d) place the application in better form for appeal, should an appeal be necessary. The amendments are necessary and were not earlier presented because they are made in response to arguments raised in the Final Rejection. Entry of the amendments is thus respectfully requested.

The Office Action rejects claims 1, 4 and 9 under 35 U.S.C. §112, second paragraph, for insufficient antecedent basis. Claims 1, 4 and 9 have been amended to obviate the rejection. Accordingly, Applicant respectfully requests reconsideration and withdrawal of the rejection to the claims.

The Office Action rejects claims 1, 3, 4, 6-9 and 11-15 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,779,125 to Haban in view of U.S. Patent No. 6,079,024 to Hadjimohammadi et al. (hereinafter "Hadji") in view of U.S. Patent No. 4,980,836 to Carter et al. (hereinafter "Carter"); and rejects claims 1, 3, 4, 6-9 and 11-15 under 35 U.S.C. §103(a) as being unpatentable over Hadji in view of Micron High Performance SDRM Modules (hereinafter "Micron") in view of Carter. Applicant respectfully traverses these rejections.

The Office Action asserts the applied references teach all the features of independent claims 1, 4, 9 and 13. However, the applied references either individually, or in combination, do not teach, nor would have suggested, a semiconductor device including at least "the first

dedicated bus interface block stopping to receive a clock signal a first predetermined time elapsed after an access of the first dedicated bus interface block to the first storage medium is completed, the second dedicated bus interface block stopping to receive a clock signal a second predetermined time elapsed after an access of the second dedicated bus interface block to the first storage medium is completed," as recited in amended claims 1, 4, 9 and similarly in claim 13.

The Office Action concedes that Haban and Hadji do not teach this feature and relies on Carter to cure the deficiencies of Haban and Hadji. The Office Action has not met a *prima facie* case of obviousness when asserting "it would have been obvious to one of ordinary skill in the art at the time of the invention to include the timers taught in Carter into the Haban and Hadji system because it would provide a means to determine when the dedicated bus interfaces are idle thus allowing the clocks to the dedicated bus interfaces to be disabled." The mere fact that references can be combined or modified does not render the resultant combination obvious. The Office Action has improperly used hindsight reasoning without stating why one of ordinary skill in the art based on the teachings of Haban and Hadji would have thought to use the timers in Carter. Applicant submits that one skill in the art, at the time of the invention, would not have possessed the capabilities in the art to make the combination as asserted. A statement that modifications of the prior art to meet the claimed invention based solely on that the references teach all aspects of the claimed subject matter is not a *prima facie* case of obviousness without some objective reason to combine the teachings (MPEP §214301(IV)). The Office Action's assertions are mere conclusory statements of the Examiner.

Additionally, the Office Action states, on page 5, that each element claimed is not included in the applied references. Specifically, Carter teaches a single timer and the combination of references do not teach individual times for each dedicated bus interface. The Office Action does not support a case for inherency with respect to the timers.

Furthermore, the Office Action asserts Carter, in col. 2, lines 15-23, teaches timers that when they expire indicate the components are inactive. However, Carter, in col. 2, lines 15-23, teaches a timer which is restarted on each access to peripheral devices of a computer system. Carter teaches when the timer counts down to zero, the system is considered inactive and power is removed from the hard disk unit. Additionally, Carter starts the countdown of the timer when each access has started. Thus, Carter may require holding sufficient time so that the system clock does not stop all the accesses and execution. However, Carter does not teach, nor would have suggested, "stopping to receive a clock signal a first predetermined time elapse after an access of the first dedicated bus interface block to the first storage medium is completed," as recited in claims 1, 4, 9 and similarly in claim 13.

Haban, Hadji and Micron fail to disclose or suggest the above features, and therefore, fail to make up for the above noted deficiencies of Carter.

For at least the reasons above, the applied references individually, or in combination, cannot reasonably be considered to teach, nor would have suggested, the combinations of all the features recited in at least independent claims 1, 4, 9 and 13. Further, claims 2, 3, 5-8, 10-12, 14 and 15 would also not have been suggested by the applied references for at least the respective dependency of these claims on allowable independent claims 1, 4, 9 and 13, respectively, as well as for the separately patentable subject matter that each of these claims recites.

Accordingly, reconsideration and withdrawal of the rejection of claims 1-15 under 35 U.S.C. §103(a) are respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-15 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Date: February 19, 2008

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